OR 7398
9-29-83
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Department of Environmental Quality

Quarterly Hazardous Waste
Treatment and/or Collection Site Report

Van Waters & Rogers
3950 NW Yeon Ave.
P.O. Box 10287
Portland, OR 97210

Phone: 222-1721
Company Contact: Jack Johnston
Stan West
I.D. No.: ORD 009227398
Visited on: September 29, 1983
Time: 1:00 p.m.
By: William D. Hartford

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Registration:

DEQ: Treatment/collection facility
EPA: Generator, storage

Principal business: Chemical distributor

Ancillary business: Handling of hazardous waste by:

(1) Collection - customers only
(2) Distillation - chlorinated solvents

No. of employees: 2
Still volume (last quarter): 2nd quarter/83 - 16,300 gallons

Environmental monitoring necessary at this inspection: Yes ___ No XX

cc: Rich Reiter, Hazardous Waste Operations, DEQ
Al Goodman, EPA
Van Waters & Rogers

VWR is in compliance upon separation of ignitable waste from all other waste. See notes page 3 and proper barrel labeling.

USEPA RCRA
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Background:

1. Is company familiar with current DEQ and EPA hazardous waste rules? yes

   Are current rules available for reference? yes

2. Are the following plans and procedures adequate?

   a. Waste analysis plan no change

   b. Site security plan no change

   c. Inspection schedule plan and log no change

   d. Preparedness and prevention plan no change

   e. Contingency plan and emergency procedures Plan in process of revision to include newly available corporate contingency plan requirements. Revised plan to be submitted to DEQ for review and approval by Dec. 1, 1983. Current plan to remain in force until amended plan is approved. --see note next page--

   f. Personnel training procedure and log no change

   g. Closure plan (including cost estimate) no change

3. Review last month's manifests/discuss last quarter's report to DEQ (discrepancies)? Aug. 1983 manifest in order. VWR has complied, as evidenced by the Aug. 1983 manifest copies with requirements of DEQ regarding completeness & cross-referencing & recoverable amount noted on manifest copy to the Department.

Information

---Spills-reportable quantities--

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(1) Currently condition B6 states all spills which may impact the environment are reportable to O.A.R. & a report to DEQ within 15 days as per contingency plan

(2) New rules--read section 340-124-100. Reportable quantity of Tri, 1-1-1, Methylene chloride & perc. is 10 lbs.

Facility tour:

1. Waste analysis area

   a. Records complete? yes, as discussed with Stan West

   b. Frequency of analysis (pick two generators)? All waste distilled

2. Treatment/collection area

   a. Generator containers labeled? Yes, but some labels incomplete, see note below.

   b. Separation of ignitable from non-ignitable? No, see note below.

   c. Treatment residue containers labeled and dated from time of filling? Yes

   d. Any leaking containers/appearance of spills? _____

   e. Condition of container area (i.e., berm, cracks, etc.) Good condition; no visible failure of surface

   f. Safety equipment in place? Yes

   g. Check log records Okay

Other comments:

Notes:

1. Discussed license requirements re: notification Oregon Emergency Services when spill occurs and failure to do so with Trichloroethylene spill last week. Must comply with license conditions. Valve replaced with positive flow direction valve & new sight tube.
2. Labels on drums from generators--manifest #'s were not on all labels from Teledyne-Wah Chang delivery. ITT Philips Drill division labels also lacked manifest #'s. Date of filling also lacking from some received barrels. VWR will notify generators of these violations as part of their customer service.

Report finished: 9/30/83 WDH

3. MIK Barrels placed adjacent to toxic & corrosive barrels. This is in violation of license conditions. VWR informed and remedial effort to separate ignitable from other waste is to be accomplished within 2 weeks.

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4. Sampling of reverse A.P.I. separator is to be at least weekly as Stan West mentioned, rather than every month or month-and-a-half, as operator said he was doing. Method of sampling is to be revised and submitted to the Department as current sampling technique does not collect bottom material liquid.